

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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ESTER LELCHOOK, *et al.*,

Plaintiff,

-against-

THE ISLAMIC REPUBLIC OF IRAN, *et al.*,

Defendants.

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Docket No:  
1:15-CV-13715(PBS)

**SUPPLEMENTAL DECLARATION OF ROBERT J. TOLCHIN**

**ROBERT J. TOLCHIN**, pursuant to 28 U.S.C. § 1746, declares the following statements to be true, subject to the penalties for perjury of the United States of America:

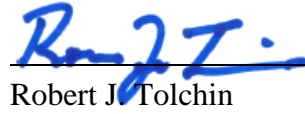
1. I am an attorney licensed to practice law before the courts of the States of New York and New Jersey, and am admitted to practice before this Court in this case *pro hac vice*. I am counsel to The Berkman Law Office, LLC, 111 Livingston Street, Suite 1928, Brooklyn, New York 11201, counsel for the plaintiffs in this matter, and I submit this supplemental declaration in further opposition to Defendant Bank Saderat PLC's motion to dismiss for lack of personal jurisdiction pursuant to Rule 12(b)(2).

2. Attached hereto as Exhibit A is a true and correct copy of 10/17/16 Decision & Order in *U.S. v. Zarrab*, 15-cr-867 (RMB) (S.D.N.Y.).

3. Attached hereto as Exhibit B is a true and correct copy of the May 21, 2016 email exchange between myself and Jeremy D. Frey.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

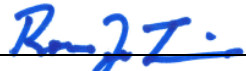
Dated: Brooklyn, New York  
October 21, 2016

  
Robert J. Tolchin

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date indicated below a true copy of the foregoing was served via ECF on all counsel of record herein:

Dated: Brooklyn, New York  
October 21, 2016

  
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Robert J. Tolchin